

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND

In re:

Algits Incorporated dba NinjaBe

Case No. 21-13888

Debtor

Chapter 11

* * * * *

VERIFIED STATEMENT OF ROBERT L KLINE, III

Pursuant to Rule 2014(a) of the Federal Rules of Bankruptcy Procedure, the undersigned, Robert L Kline, III, hereby makes the following verified statement to accompany the Debtor's Application to Employ Kline Law Group LLC as Bankruptcy Counsel:

1. I am a principal with the law firm of Kline Law Group, LLC ("Kline Law"). I am an attorney licensed to practice law in the State of Maryland, and am a member of the bar of the United States District Court for the District of Maryland.
2. I submit this Verified Statement in support of the application of TSC , the above-captioned debtor and debtor-in-possession (the "Debtor"), to employ Kline Law Group LLC as its bankruptcy counsel in this Chapter 11 case.
3. Unless otherwise stated, I have personal knowledge of the facts set forth herein.
4. In connection with the proposed retention of Kline Law by the Debtor in this Chapter 11 case, I caused a review to be undertaken to determine any connections that Kline Law may have had with the Debtor, its creditors, and other parties in interest.
5. Based upon the review referenced in the foregoing paragraph, and to the best of my knowledge and belief, the undersigned and Kline Law have no connections with the

Debtor, creditors, or any other party interest, their respective attorneys and accounts, the United States Trustee, or any person employed by the Office of the United States Trustee.

6. No promises have been received by Kline Law, as to compensation in connection with this case other than in accordance with the provisions of the Bankruptcy Code. Kline Law has no agreement with any other entity to share with such entity any compensation received by Kline Law in connection with this case.
7. Kline Law is a “disinterested person,” as that term is defined in Section 101(14) of the Bankruptcy Code and is eligible to serve as counsel for the Debtor.
8. Kline Law received a prepetition retainer from the Debtor in the amount of \$40,000, of which \$7283.00 was applied against Kline Law’s prepetition professional fees and \$1,717.00 was used to pay the Court filing fee in this case. As of the Petition Date, Kline Law was holding unearned retainer funds in the amount of \$31,000. The Debtor has advised Kline Law that the retainer was paid with Debtor’s funds.
9. Kline Law has represented Algits Incorporated, and the officers, namely Dawn Alexander and April Giles in pre petition litigation commenced by creditors of the Debtor. Kline Law has never represented the Debtor or either of the officers, Alexander and/or Giles personally in the past.
10. Kline Law will update this Verified Statement and will make such supplemental disclosures as circumstances may require.

Pursuant to 11 U.S.C. Section 1746, I verify under the penalties of perjury that the foregoing is true and correct.

Date: June 15, 2021

/s/ Robert L Kline, III
Robert L. Kline, III, Bar ID#4357
Kline Law Group LLC
5 Public Square, Suite 200
Hagerstown, MD 21740
240 347 4944
klinelawgroupllc@gmail.com